

CORRES. CONTROL
OUTGOING LTR NO.

93 RF 3500

EG&G ROCKY FLATS

DIST.	LTR	ENG
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
COPP, R.D.		
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MANN, H.P.		
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McKENNA, F.G.		
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WILSON, J. M.		
ZANE, J. O.		

Benedetti RT X
Smith TA
Schubbe DBX
Arndt MBX

CORRES CONTROL x x
Admin. Rec. x
ERM Track'g X

CLASSIFICATION:

UCNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE

C. M. Pasqua

3-19-93

DATE

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS

☐ OPEN ☐ CLOSED

☐ PARTIAL

LTR APPROVALS

ORIG & TYPIST INITIALS

DS/dmf

RF-46469 (Rev. 9/92)

EG&G ROCKY FLATS, INC.

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March 22, 1993

93-RF-3500

Richard J. Schassburger
Acting Director
Environmental Restoration Division
DOE, RFO

IMPLEMENTATION OF THE PHASE I RFI/RI WORK PLAN FOR OPERABLE UNIT NO. 15, INSIDE BUILDING CLOSURES - MBA-035-93

The purpose of this letter is to inform DOE/RFO of EG&G's approach to implementation of the Phase I RCRA Facilities Investigation/Remedial Investigation (RFI/RI) Work Plan for Operable Unit No. 15 (OU 15). A Staged RFI/RI approach is presented within the OU 15 Work Plan. The Stages are defined as follows: Stage I which includes sampling within the individual hazardous substance site (IHSS) and IHSS perimeter inside buildings; Stage II which includes sampling along potential contaminant migration pathways inside the buildings; and Stage III which includes sampling outside of the buildings.

EG&G is planning to perform Stage I and Stage II sampling concurrently in order to avoid having to access buildings twice and to reduce costs associated with Work Plan implementation. The cost savings associated with performing Stage I and Stage II sampling concurrently includes costs associated with accessing buildings (e.g., screening equipment into buildings), purchase of additional equipment (i.e., to replace equipment that will probably have to remain in Radiologically Controlled Areas sampled during Stage I), additional sample container shipping, management of separate Stage II implementation, etc. In addition, performing Stage I and Stage II sampling concurrently will reduce the time necessary to complete fieldwork and laboratory analyses which will help ensure that future OU 15 IAG Milestones will be met.

The Phase I RFI/RI Work Plan for OU 15 also includes Verification sampling (i.e., repeating of Stage I and II up to two more times). Verification sampling was included within the OU 15 Work Plan because it was recognized that the steam rinsate sampling to be performed during Stage I and Stage II may reduce or remove potential contaminant concentrations from the IHSSs. In effect, after performance of Stage I and Stage II sampling has been completed, the IHSSs may meet RCRA Clean Closure Performance Standards (RCCPS) which have been specified as the Applicable or Relevant and Appropriate Requirements (ARARs) for the OU 15 RFI/RI. EG&G is not planning to conduct Verification sampling within the same fieldwork mobilization (i.e., the same building access period) as Stage I and Stage II sampling in order to determine if RCCPS have been met. We do not expect to detect significant concentrations of RCRA-regulated constituents as a result of Stage I and Stage II sampling, and therefore, probably no further OU 15 RFI/RI characterization work will be necessary. EG&G believes that this is a reasonable assumption based on the following:

- 1) Only one (1) release has been documented at an OU 15 IHSS (i.e., IHSS 204); therefore, the ARARs (i.e., RCCPS) have probably not been exceeded within the IHSSs in the past or are currently exceeded;

REVIEWED FOR CLASSIFICATION/UCNI
BY G. T. Oudier
DATE 3-31-93

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- 2) RCRA-regulated volatiles, if released within the IHSSs, would have volatilized within a relatively short period of time after release and the IHSS would then probably meet RCCPS for these constituents;
- 3) If contamination was present within the IHSSs in the past, routine building cleaning practices have probably resulted in the IHSSs currently meeting RCCPS;
- 4) Since the inside building HHRA will be performed based on a worker exposure scenario and the allowable worker exposure is relatively high compared with other exposure scenarios, evaluation of the results of HHRA will most likely indicate that no further action is necessary inside buildings even if RCRA constituents are detected within OU 15 IHSSs; and
- 5) If worker exposure within the buildings is currently unacceptable, the presence of contaminants (e.g., radiation) would already be documented through routine building practices (i.e., Health and Safety monitoring, etc.).

If you have questions regarding this correspondence or comments with regard to EG&G's approach for implementation of the Phase I RF/RI for OU 15, please contact D. L. Schubbe of Remediation Project Management at extension 8709.



M. B. Arndt
Director
ERM/Remediation Project Management
EG&G Rocky Flats, Inc.

DLS:dmf

Orig. and 1 cc - R. J. Schassburger

cc:
J. Pepe - DOE, RFO